

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: <b>PAUL HRYWNAK, JR.</b> , aka	:	Chapter <b>13</b>
Paul Hrywnak,	:	Case No. <b>5:23-bk-02348-MJC</b>
Debtor(s),	:	
<b>JACK N. ZAHAROPOULOS, Trustee,</b>	:	
Movant,	:	Motion to
v.	:	Dismiss
<b>PAUL HRYWNAK, JR.,</b>	:	
Respondent,	:	

**ANSWER TO TRUSTEE’S MOTION TO DISMISS**

AND NOW COMES Debtor(s) **PAUL HRYWNAK**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Response to the Trustee’s Motion to Dismiss avers:

1. Admitted.
2. Admitted. Debtor did not file within that six-month period.
3. Admitted.
4. Admitted. As Debtor was unable to provide his Social Security Card, which was required, Counsel for Debtor requested the Meeting be rescheduled.
5. Admitted in part and Denied in part. Debtor attempted to attend the Meeting of Creditors via Zoom was unable to do so due to technical difficulties.
6. Admitted.
7. Admitted. See response to paragraph 4.
8. Admitted in part and Denied in part. Debtor is not elderly, but old, and has minimal understanding of modern electronics. Debtor reasonably believes that he would have been able to attend an in person Meeting of Creditors on December 18, 2023, had he had such an option. Debtor’s lack of technical sophistication should not be held against him.
9. Admitted in part and Denied in part. Debtor has two Plan payments available.

10. Denied. Debtor requests that the Court focus on the instant case, not his history, and accept that payment of \$2,000 to the Trustee on or before January 31, 2024, would demonstrate substantial good faith to allow the case to continue.

WHEREFORE, Debtor **PAUL HRYWNAK** respectfully prays this Honorable Court for an Order that Denies the Trustee's Motion to Dismiss, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman

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